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Attorneys for Motors Liquidation
Company GUC Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.
: :
MOTORS LIQUIDATION COMPANY, *et al.* : 09-50026 (REG)
f/k/a General Motors Corp., *et al.* :
: :
Debtors. : (Jointly Administered)
: :
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**NOTICE OF PRESENTMENT OF PROPOSED ORDER GRANTING DEBTORS'
OBJECTION TO PROOF OF CLAIM NO. 69842 FILED BY JOHN PIERRO**

PLEASE TAKE NOTICE that, the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by the above-captioned debtors (collectively, the “**Debtors**”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan dated March 18, 2011, will present the attached Order granting the GUC Trusts’ Objection to Proof of Claim No. 69842 filed by John Pierro (the “**Proposed Order**”) to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for signature on **May 14, 2012 at 12:00 noon (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Proposed Order must be made in writing and received (i) in the Bankruptcy Judge’s chambers at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 and (ii) by Dickstein Shapiro LLP, attorneys for the GUC Trust,

1633 Broadway, New York, New York 10019 (Attn: Stefanie Birbrower Greer, Esq., and Barry N. Seidel, Esq.), not later than **May 14, 2012 at 11:30 a.m. (Eastern)**. Unless objections are received by that time, the GUC Trust may submit the Proposed Order to the Bankruptcy Court, which may be entered with no further notice or opportunity to be heard to any party.

Dated: New York, New York
April 30, 2012

/s/ Stefanie Birbrower Greer
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Debtors. : (Jointly Administered)
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**ORDER GRANTING OBJECTION TO PROOF OF
CLAIM NO. 69842 FILED BY JOHN PIERRO**

Upon the 89th Omnibus Objection to Proof of Claim Number 69812 (the “Claim”) filed by John Pierro dated January 26, 2012 (the “Objection”) (ECF. No. 6996), of the Motors Liquidation Company GUC Trust (the “GUC Trust”), formed by the above-captioned debtors (collectively, the “Debtors”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan, dated March 18, 2011 (as may be amended, supplemented, or modified from time to time, the “Plan”), pursuant to section 502(b) of title 11, United States Code (the “Bankruptcy Code”), seeking entry of an order disallowing and expunging the Claim on the basis that it was not timely filed, as more fully described in the Objection; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and the Court having considered the response to the Objection filed by John Pierro (ECF. No. 7563), the GUC Trust’s reply thereto (ECF. No. 11491); and the Court at the hearing on the Objection on April 26th, 2012 (the “Hearing”) having found and determined that the relief sought in the Objection is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish

just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Objection is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Claim is disallowed and expunged; and it is further

ORDERED that the time to appeal runs from the date this order is entered; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
_____, 2012

United States Bankruptcy Judge